



Steven W. Gold	Peter Guirguis
Steven G. Mintz*	Andrew R. Gottesman
Jeffrey D. Pollack*	Matthew S. Seminara
Elliot G. Sagor	Julia B. Milne
Ira Lee Sorkin	James W. Kennedy
Lon Jacobs	Ryan W. Lawler*
Steven A. Samide	Andrew A. Smith
Scott A. Klein	Amit Sondhi
Terence W. McCormick***	Brett Josphe
Robert B. Lachenauer	Michael Mooney
Roger L. Stavis	Adam K. Brody
Charles A. Ross**	Andrew E. Steckler
Richard M. Breslow	Alex J. Otchy*
Barry M. Kazan*	Philip Tafet
Craig D. Spector*	Carli M. Aberle
Kevin M. Brown	Zachary J. Turquand
Alexander H. Gardner	Kellyann T. Ryan
Heath Loring	Sitie "Esther" Tang

Senior Counsel
Jack A. Horn
Noreen E. Cosgrove
Timothy J. Quill, Jr.

Of Counsel
Honorable Vito J. Titone (*dec.*)
NY State Court of Appeals 1985–1998
Harvey J. Horowitz (*dec.*)
Honorable Howard Miller
NY Appellate Div. 1999–2010 [ret.]
Alan Katz
Eric M. Kutner
Andrew P. Napolitano°
Brian T. Sampson
Erica Nazarian
Tara Shamroth
Jared Van Vleet

°Admitted to practice only before all courts in New Jersey and all Federal Courts in New York City

August 14, 2023

Via ECF and Email

(Sui-May.Yuen@nyed.uscourts.gov, Michele.Sica@nyed.uscourts.gov)

Hon. Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Aurelien Michel,*
23-mj-00007-JRC

Dear Judge Bulsara:

We represent Defendant Aurelien Michel (“Mr. Michel”) in the above-captioned case. We write to respectfully request that the Court issue an Order modifying the conditions of Mr. Michel’s release from home detention to a curfew as directed by Pretrial Services. Pretrial Services consents to this request, and the Government does not object.

On February 1, 2023, Your Honor ordered that Mr. Michel be subject to home detention as directed by Pretrial Services as a condition of Mr. Michel’s release (*see* Order Setting Conditions of Release and Appearance Bond, dated February 1, 2023 (ECF Doc. No. 10)). Since then, despite spending more than six months as a foreign national in the United States, with limited facility in English and minimal visitation from family, Mr. Michel has been a model supervisee. Pretrial Services has not notified counsel of any violations of Mr. Michel’s home detention or any other bail conditions. Most importantly, Mr. Michel has appeared before the Court as required on June 7 and July 11 without incident.



Hon. Sanket J. Bulsara, U.S.M.J
United States v. Michel
August 14, 2023
Page 2

For all the foregoing reasons, Mr. Michel respectfully requests that the Court issue an Order modifying the conditions of his release from home detention to a curfew as directed by Pretrial Services.

Respectfully submitted,

MINTZ & GOLD LLP

By: /s/ Adam K. Brody
Ira Lee Sorkin
Adam K. Brody
600 Third Avenue, 25th Floor
New York, NY 10016
212-696-4848
sorkin@mintzandgold.com
brody@mintzandgold.com

Cc: Valeria Lopez
U.S. Pretrial Services Officer
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Via Email

Assistant United States Attorney Dylan A. Stern
Assistant United States Attorney Drew G. Rolle
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Via ECF and Email